

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESale PRICE  
LITIGATION

MDL NO. 1456

CIVIL ACTION: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Judge Patti B. Saris

**MOTION FOR ADMISSION *PRO HAC VICE* OF SAMUEL LONERGAN**

Pursuant to Local Rule 83.5.3(b), Brett R. Budzinski, an associate at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, a member of the bar of this Court, and an attorney of record for Novartis Pharmaceuticals Corporation ("Novartis"), hereby moves for the admission *pro hac vice* of Samuel Lonergan as counsel for Novartis in this action.

In support of this motion, Mr. Lonergan has certified that: (1) he is a member of the bar in good standing in every jurisdiction where he has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; and (3) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts. Mr. Lonergan's certification is attached hereto as Exhibit A.

Respectfully submitted,

/s/ Brett R. Budzinski

Karen F. Green (BBO #209050)  
Benjamin M. Stern (BBO #646778)  
Brett R. Budzinski (BBO #655238)  
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Dated: March 24, 2006

**CERTIFICATE OF SERVICE**

I, Brett R. Budzinski, certify that, on this March 24, 2006, a copy of the foregoing document has been served on counsel of record by electronic means pursuant to the Court's Case Management Order dated July 23, 2002.

/s/ Brett R. Budzinski

Brett R. Budzinski